

1 Carl J. Oreskovich, WSBA #12779
2 Andrew M. Wagley, WSBA #50007
3 Etter, McMahon, Lamberson,
4 Van Wert & Oreskovich, P.C.
5 618 West Riverside Avenue, Suite 210
6 Spokane, WA 99201
7 (509) 747-9100
8 (509) 623-1439 Fax
9 Email: carl@ettermcmahon.com
10 Email: awagley@ettermcmahon.com
11 *Attorneys for Defendant Ronald C. Ilg, MD*

12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF WASHINGTON

14 UNITED STATES OF AMERICA,

15
16 Plaintiff,

17 v.
18

19 RONALD CRAIG ILG,

20 Defendant.
21
22

Case No. 2:21-cr-00049-WFN

**DECLARATION OF ANDREW M.
WAGLEY IN SUPPORT OF
DEFENDANT’S MOTION TO
CONTINUE SENTENCING
HEARING AND ASSOCIATED
DEADLINES**

23
24 I, Andrew M. Wagley, do hereby declare the foregoing is true and correct
25 to the best of my knowledge:
26

- 27 1. I am an attorney of record for the Defendant, Ronald C. Ilg, MD (“Dr.
28 Ilg”). I make this Declaration in support of Defendant’s Motion to
29 Continue Sentencing Hearing and Associated Deadlines.
30
31
32

- 1 2. Dr. Ilg's Sentencing Hearing is currently scheduled for Tuesday,
2
3 November 8, 2022 at 9:00 am. Dr. Ilg remains in custody at the
4
5 Spokane County Jail pending sentencing.
- 6 3. For purposes of Dr. Ilg's sentencing, we are in the process of obtaining
7
8 a report from Dr. Ilg's previous treating Psychologist, Jennifer Van
9
10 Wey. From my understanding, Dr. Van Wey indicated to Mr.
11
12 Oreskovich that she would be unable to complete the report until the
13
14 end of November 2022. We also may utilize additional expert
15
16 witness(es) in support of Dr. Ilg's sentencing arguments.
- 17 4. Mr. Oreskovich and I currently have a criminal trial scheduled in
18
19 Spokane County Superior Court set to commence on Monday,
20
21 December 12, 2022. This matter is a prosecution for various felony sex
22
23 crimes and is entitled *State of Washington v. Mark Hoffmeister*, Case
24
25 No. 19-11-12623-2. See [https://cp.spokanecounty.org/courtdocument](https://cp.spokanecounty.org/courtdocumentviewer/iFrames/iFrameSCHearingByDefendantNameDetailed.aspx?pt=681103)
26
27 [viewer/iFrames/iFrameSCHearingByDefendantNameDetailed.aspx?pt=](https://cp.spokanecounty.org/courtdocumentviewer/iFrames/iFrameSCHearingByDefendantNameDetailed.aspx?pt=681103)
28
29 681103. It is anticipated this trial will last approximately two-weeks.
- 30 5. Defendant's Motion to Continue Sentencing is unopposed. Specifically,
31
32 the Government, by and through Assistant United States Attorney Rich
Barker, and the United States Probation Office, by and through

1 Probation Officer Cassie Lerch, do not oppose this continuance request.

2
3 The parties have conveyed and request one of the following dates if
4 available from the Court: Tuesday, January 24, 2023, at 10:00 a.m.; or
5
6 Thursday, January 26, 2023, at 9:00 a.m.
7

8 6. Additionally, Dr. Ilg does not oppose a continuance request based upon
9
10 the reasons indicated herein.

11 7. This continuance request is made in good faith and not for the purpose
12
13 of hindering or delaying this matter.
14

15 I hereby declare under penalty of perjury of the laws of the State of
16 Washington and the United States that the foregoing is true and correct.
17

18 EXECUTED this 20th day of October, 2022 in Spokane, Washington.
19

20
21 By: /s/ Andrew M. Wagley
22 Andrew M. Wagley
23
24
25
26
27
28
29
30
31
32

1 **CERTIFICATE OF SERVICE**

2

3 I hereby certify that on October 20, 2022, I electronically filed the

4 foregoing document with the Clerk of the Court using the CM/ECF System,

5

6 which will send notification of such filing to all attorneys of record.

7

8 EXECUTED in Spokane, Washington this 20th day of October, 2022.

9

10 By: /s/ Jodi Dineen

11 Jodi Dineen

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

29

30

31

32